



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 13, 2018

Ensystem III, Inc.
c/o Arianna Shorey
Regulatory Consultant
Pyxis Regulatory Consulting, Inc.
4110 136th St. Ct. NW
Gig Harbor, WA 98332

Subject: Label Amendment – Revise Water Soluble Packaging Directions for Use as per
EPA letter dated April 5, 2017
Product Name: Prothor WP
EPA Registration Number: 82957-2
Application Date: 09/29/2017
Decision Number: 542286

Dear Ms. Shorey:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Paul Di Salvo by phone at 703-347-0322, or via email at disalvo.paul@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Paul Di Salvo" with a small flourish at the end.

Venus Eagle, Product Manager 07
Invertebrate and Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Enclosure



ACCEPTED
 07/13/2018
 Under the Federal Insecticide, Fungicide
 and Rodenticide Act as amended, for the
 pesticide registered under
 EPA Reg. No. 82957-2

PROTHOR WP

For use only by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	<u>25.0%</u>
TOTAL:	100.0%

Keep water soluble packets in outer container until immediately before use. Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-2 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: _____oz.

Manufactured by:

ENSYSTEX III, Inc.

2175 Village Drive, Fayetteville, NC 28304

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and water-proof gloves. After the product is diluted in accordance with label directions for use, shirt, pants, socks and water-proof gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label. Extreme care must be taken to avoid runoff.

Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur. This product is highly toxic to bees exposed to direct treatment or residues on blooming, crops, plants or weeds. Do not apply this product or allow it to drift to blooming crops, plants or weeds if bees are foraging in the treatment area.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening outer container.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex III at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

Termite Control Treatment: When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

[ENGINEERING CONTROLS STATEMENT

Water soluble packets, when used correctly, qualify as a closed mixing/loading system under the Worker Protection Standard [40 CFR 170.607(d)]. Mixers and loaders handling this product while it is enclosed in intact water soluble packets may elect to wear reduced PPE of long-sleeved shirt, long pants, shoes, socks, and chemical-resistant gloves. When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for “applicators and other handlers” and have such PPE immediately available for use in an emergency, such as a spill or equipment break-down.”]

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

PROTHOR WP, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician must be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes*, *Heterotermes* and *Reticulitermes*. The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR WP is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR WP mixed in reduced volumes of water.

RESTRICTIONS FOR SUBTERRANEAN TERMITE CONTROL

- Do not contaminate water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply.
- Do not contaminate cisterns or wells.
- Do not treat soil that is water saturated or frozen.
- Do not treat while precipitation is occurring.
- Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur.
- Do not apply to soil in areas where edible plants may be planted. Do not plant edible plants in soil that has been treated with PROTHOR WP.
- Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label.
- Consult state and local specifications for specified distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR WP

[Each PROTHOR WP outer container contains a number of clear water soluble packets. Do not allow the packets to become wet at any time before putting them into a spray tank at the time of intended mixing. Handling the packets with wet hands or gloves or in a rough manner can cause them to leak. Reseal the outer container if water soluble packets are left inside after opening.]

Use rates for PROTHOR WP are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR WP* or alternately the formulas below to determine the amount of PROTHOR WP to add to any quantity of water.

To mix, measure out the required amount of PROTHOR WP according to the *Mixing Table for PROTHOR WP* with the PROTHOR WP Mixing Scoop. Pour this amount of PROTHOR WP into the spray tank as it is being filled with water with the agitator operating.

[Instructions for Using Water Soluble Packages Directly into Spray Tanks:

Water Soluble Packages (WSPs) are designed to dissolve in water. Agitation may be used, if necessary, to help dissolve the WSP. Failure to follow handling and mixing instructions can increase your exposure to the pesticide products in WSPs. WSPs, when used properly, qualify as a closed mixing/loading system under the Agricultural Worker Protection Standard [40 CFR 170.607(d)].

Handling Instructions

Follow these steps when handling pesticide products in WSPs.

1. Mix in spray tank only.
2. Handle WSP(s) in a manner that protects package from breakage and/or unintended release of contents. If package is broken, put on PPE required for clean-up and then continue with mixing instructions.
3. Keep the WSP(s) in outer packaging until just before use.
4. Keep the WSP dry prior to adding to the spray tank.
5. Handle with dry gloves and according to the label instructions for PPE.
6. Keep WSP intact. Do not cut or puncture WSP.
7. Reseal the WSP outer packaging to protect any unused WSP(s).

Mixing Instructions

Follow the steps below when mixing this product, including if tank mixed with other pesticide products. If being tank mixed, the mixing directions 1 through 9 below take precedence over the mixing directions of the other tank mix products. WSPs may, in some cases, be mixed with other pesticide products so long as the directions for use of all mixed products do not conflict. Do not tank mix this product with products that prohibit tank mixing or have conflicting mixing directions.

1. If a basket or strainer is present in the tank hatch, remove prior to adding the WSP to the tank.
2. Fill tank with water to approximately one-third to one-half of the desired final volume of spray.
3. Stop adding water and stop any agitation.

4. Place intact/unopened WSP(s) into the tank.
5. Do not spray water from a hose or fill pipe to break or dissolve the WSP(s).
6. Start mechanical and recirculation agitation from the bottom of tank without using any overhead recirculation, if possible. If overhead recirculation cannot be turned off, close the hatch before starting agitation.
7. Dissolving the WSP(s) may take up to 5 minutes or longer, depending on water temperature, water hardness and intensity of agitation.
8. Stop agitation before tank lid is opened.
9. Open the lid to the tank, exercising caution to avoid contact with dusts or spray mix, to verify that the WSPs have fully dissolved and the contents have been thoroughly mixed into the solution.
10. Do not add other allowed products or complete filling the tank until the bags have fully dissolved and pesticide is thoroughly mixed.
11. Once the WSP have fully dissolved and any other products have been added to the tank, resume filling the tank with water to the desired level, close the tank lid, and resume agitation.
12. Use the spray solution when mixing is complete.
13. Maintain agitation of the diluted pesticide mix during transport and application.
14. It is unlawful to use any registered pesticide, including WSPs, in a manner inconsistent with its label.]

[Mix PROTHOR WP to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR WP.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes.”

Prothor WP may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

To mix, open the outer container and remove the required number of packets needed for the gallon amount of solution to be mixed according to the *Mixing Table for PROTHOR WP*. Drop the required number of packets (unopened) into the spray tank as it is being filled with water with the agitator operating. The elapsed time until the packets are fully dissolved depends on the degree of agitation and the temperature of the water with more time needed for lower levels of agitation and lower temperatures. Generally, a few minutes is sufficient time for the packets to completely dissolve.]

Do not use PROTHOR WP packets in tanks also containing products that contain boron or free chlorine. The packet material may react with the boron or chlorine to form a non-water soluble compound instead of dissolving into the water.

However chlorinated water use is acceptable and will not cause this compound to form or reaction to occur.

Mixing Table for PROTHOR WP		
Solution Percentage Concentration Desired	Gallons of Finished Solution Desired	Amount of PROTHOR WP to add # of packets # of level Scoops / Ounces / Grams
0.05%	25	1 / 2.25 oz. / 64 grams
	50	2 / 4.50 oz. / 128 grams
	100	4 / 9.00 oz. / 255 grams
0.10%	25	2 / 4.50 oz. / 128 grams
	50	4 / 9.00 oz. / 255 grams
	100	8 / 18.00 oz. / 511 grams

Calculating an Amount of PROTHOR WP to Mix

To mix any amount of PROTHOR WP determine:

A = Gallons of water into which PROTHOR WP will be mixed. Express any partial gallons as decimal fractions (1/2 = 0.5).

Level scoops of PROTHOR WP to add to A gallons for 0.05% = A / 25

Level scoops of PROTHOR WP to add to A gallons for 0.10% = A / 12.5

Ounces of PROTHOR WP to add to A gallons for 0.05% = A x 0.09

Grams of PROTHOR WP to add to A gallons for 0.05% = A x 2.55

Ounces of PROTHOR WP to add to A gallons for 0.10% = A x 0.18

Grams of PROTHOR WP to add to A gallons for 0.05% = A x 5.11

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR WP as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low

as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR WP applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR WP applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes must not extend below the footing. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat the soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to

a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes must not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to **Termite Control Treatment** in Directions for Use). **Restriction:** Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to not puncture these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is

exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes must be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 lineal feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls:

Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls:

Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes must be spaced so as to achieve a continuous chemical barrier. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding can be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes.

Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.
2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.
3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.
4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR WP.

PROTHOR WP can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR WP.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.
2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site.

When drilling veneer walls, care must be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Restrictions: Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed. Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Restriction: Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

- a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
- b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR WP for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
- c. After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment specifications listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.
2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.
3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR WP, in the form of a foam, can be used to deliver PROTHOR WP as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR WP into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR WP where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR WP may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR WP must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

2.25 ounces of PROTHOR WP (1 WSP packet) can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0.05% active ingredient. 4.50 ounces of PROTHOR WP (2 WSP packets) can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient. See the Foam Mixing and Expansion

Table below for foam mixing and expansion ratios. [Refer to **Mixing Instructions** above for mixing procedure.]

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of Prothor WP to Add to Water	Expansion Ratios
25	1.0	2.25 ounces (1 WSP packet)	25:1
25	2.5	2.25 ounces (1 WSP packet)	10:1
25	5.0	2.25 ounces (1 WSP packet)	5:1
50	1.0	4.50 ounces (2 WSP packets)	50:1
50	2.5	4.50 ounces (2 WSP packets)	20:1
50	5.0	4.50 ounces (2 WSP packets)	10:1

*Add the foaming agent manufacturer's specified amount of foaming agent to solution after water and Prothor WP are mixed. Verify that the foaming agent is compatible with PROTHOR WP before mixing or using with PROTHOR WP.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR WP (see Foam Mixing Instructions) may be converted into a predetermined amount foam according to the foaming agent and foaming equipment manufacturer's specifications. Verify that the foaming agent is compatible with PROTHOR WP.

First, form a solution of PROTHOR WP of the appropriate percentage concentration and volume (see Foam Mixing Instructions). Then add to the solution the specified volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply a sufficient volume of PROTHOR WP in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the specified rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the

effectiveness of the barrier. Retreatment may be made as either a spot or residual treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase its vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR WP can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR WP according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR WP treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR WP at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR WP can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the

soil and applying a 0.05% to 0.10% solution of PROTHOR WP at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR WP directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR WP to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however do not allow excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR WP as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR WP in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

RESTRICTIONS FOR EXTERIOR ANT APPLICATION:

- Do not treat more often than once per month.
- Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried.
- Do not apply PROTHOR WP to groundcover, flowering shrubs or plant beds that are flowering. Only apply after all petals have fallen off.
- Do not apply to soil in areas where edible plants may be planted. Do not plant edible plants in soil that has been treated with PROTHOR WP.
- Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon
- Do not use PROTHOR WP against native fire ants, imported fire ants, pharaoh ants or harvester ants.
- Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the

structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR WP can be made.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

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EPA APPROVAL DATE